



BellSouth Telecommunications, Inc.
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December 11, 2003

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VIA HAND DELIVERY

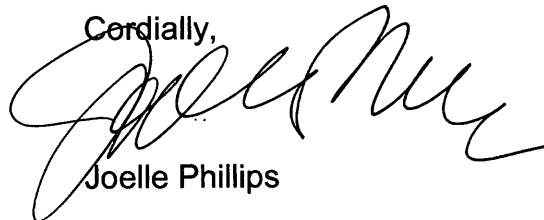
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Tariff to Establish Consumer Wireless Combined Bill Reward Offer*
Docket No. 03-00624

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's *Response to Complaint and Petition to Intervene* filed by the Consumer Advocate Division. Copies of the enclosed are being provided to the Consumer Advocate Division.

Cordially,



Joelle Phillips

JJP:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Tariff to Establish Consumer Wireless Combined Bill Reward Offer*

Docket No. 03-00624

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO
CONSUMER ADVOCATE DIVISION'S COMPLAINT AND
PETITION TO INTERVENE

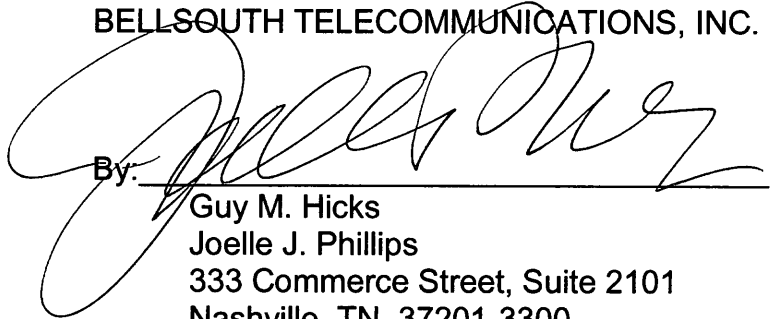
BellSouth Telecommunications, Inc. ("BellSouth") files this response to the *Complaint and Petition to Intervene* ("Petition") filed by the Consumer Advocate Division ("Consumer Advocate") in the above-referenced docket. BellSouth objects to the convening of a contested case and the delay it will cause in bringing this promotion to Tennessee customers.

The Consumer Advocate's *Petition* is nearly identical to the petitions filed in numerous other BellSouth promotional offerings. As demonstrated in the case of the *Integrated Solutions* bundle and the *Wireless Answers* bundle, these petitions cause delay in the implementation of promotional offerings available throughout BellSouth's region and deny Tennessee customers the opportunity to enjoy the benefits of discounts offered by BellSouth elsewhere in its region. BellSouth respectfully urges the Authority to refrain from convening a contested case in this matter on the basis of the general allegations contained in the *Petition*. In the alternative, BellSouth urges the Authority to permit the promotion to become effective. Any ruling by the Authority relating to the issues raised in this and numerous other nearly identical petitions by the Consumer Advocate can be applied to the tariff at the time that such ruling is made.

However, given the time required to resolve the Consumer Advocate's numerous complaints regarding bundled promotions, BellSouth respectfully urges the Authority to allow this promotion to become effective pending the resolution of the Consumer Advocate's *Petition*.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

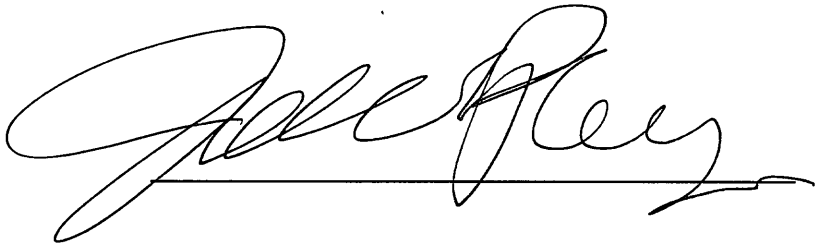
By: 
Guy M. Hicks
Joelle J. Phillips
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615/214-6301

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2003, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Vance Broemel, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

A handwritten signature in black ink, appearing to read "Vance Broemel", is written over a horizontal line.